

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

) Chapter 11

) Case No. 22-11068 (JTD)

) (Jointly Administered)

**SUPPLEMENTAL DECLARATION OF MATTHEW B. LUNN IN SUPPORT  
OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO RETAIN AND EMPLOY YOUNG CONAWAY STARGATT & TAYLOR, LLP  
AS CO-COUNSEL, EFFECTIVE AS OF DECEMBER 22, 2022**

I, Matthew B. Lunn, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway” or the “Firm”), with offices at Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, and am duly admitted to practice in the States of Delaware and New York and the District of Columbia, as well as the United States District Court for the District of Delaware, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second and Third Circuits.

2. I submit this supplemental declaration (this “Supplemental Declaration”) in support of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ*

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

*Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022* (the “Application”) [Docket No. 522].<sup>2</sup>

3. No attorneys at the Firm have or had any connection with the Debtors, current and former directors and officers, large equity holders, non-Debtor affiliates, the joint provisional liquidators, or members of the Committee, although Young Conaway has worked with Mr. Joseph Farnan, one of the independent directors, in his professional capacity.

4. One attorney at the Firm has an account with one of the Debtors, but that account was never funded and such attorney is not assigned to these chapter 11 cases.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: February 8, 2023  
Wilmington, Delaware

/s/ Matthew B. Lunn  
Matthew B. Lunn

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Application.